

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

v.

RASHAD SABREE

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Criminal No. 2:17-cr-00158-JDL

PROSECUTION VERSION

If this case were to proceed to trial, the government would prove that from about December 2015 through January 5, 2016, the defendant knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited, by any means, Victims 1 and 2, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause Victims 1 and 2 to engage in commercial sex in violation of 18 U.S.C. § 1591. The government would prove the following facts through witness testimony, physical evidence, and documentary evidence.

The defendant met Victim 1 on an internet dating site in early December 2015, and he moved into her apartment in Portland, Maine, for a short time. The defendant learned that Victim 1 engaged in prostitution. After about a week, the defendant left her apartment, but contacted her later in the month and asked her to come to an apartment in Biddeford, Maine, where he was staying. Victim 1 traveled to the apartment; while meeting with the defendant, he proposed that she allow him and another woman, Victim 2, to come back to her apartment. The defendant told Victim 1 that Victim 2 was prostituting and making a lot of money.

Victim 1 agreed to allow the defendant and Victim 2 to return to her apartment. Victims 1 and 2 were addicted to heroin at this time. From the apartment, the defendant directed Victim 1 to post commercial sex advertisements for Victim 2 on the internet webpage, Backpage.com. The defendant directed Victim 2 to see prostitution clients at Victim 1's apartment or at local

hotels. Clients contacted Victim 2 using a cell phone provided to her by the defendant. Victim 2 provided the monetary proceeds of the prostitution to the defendant, and the defendant supplied Victim 2 with just enough heroin to keep her from suffering opiate withdrawal symptoms. The defendant also enticed Victim 1 to prostitute as well, promising her that she could make a lot of money, and that he would also provide her with heroin. The defendant directed Victim 1 to post commercial sex advertisements for herself on Backpage.com. At the defendant's direction, Victim 1 also provided the defendant with the monetary proceeds from her prostitution clients.

The government would prove that during that time, the defendant was verbally abusive to both Victims 1 and 2, belittling them over their drug use, calling them "junkies," "stupid," and "trash." On one occasion, he threw a baggie of heroin at Victim 1 and told her to shoot it all because "he wanted to watch her die." The defendant threatened to withhold heroin from Victims 1 and 2 if they did not engage in commercial sex, knowing that the victims would begin to go into withdrawal, become physically sick, and suffer severe pain. The defendant also threatened (albeit did not resort to at that time) the use of physical violence to compel the victims to prostitute.

The government would further prove that eventually, the victims reached out to friends and family for help. On January 5, 2016, the defendant instructed the victims that they were going to Massachusetts. The defendant drove Victim 1's car south on I-95, with Victim 1 in the passenger seat and Victim 2 in the backseat. The victims did not wish to go to Massachusetts, and text messages they sent that morning from Victims 1's apartment and while in the car indicate that they were scared and seeking help. For example, Victim 2 sent a series of texts messages to her mother that read, "in a bad situation," "u have no idea," and "have you heard of human trafficking. That's what im stuck in." Similarly, a series of Facebook messages from

Victim 1's account read, "This situation. I'm not going to make it... And neither is she... He's pretty much holding us hostage. More her than me but he's dangling our addiction over our heads...."

During the car ride to Massachusetts, the defendant looked at Victim 1's phone and saw her text messages. The government's evidence would demonstrate that shortly after the defendant saw the text messages, his phone accessed Backpage.com and deleted the advertisements of Victims 1 and 2. The evidence would further demonstrate that minutes later a nearby motorist witnessed the defendant assault Victim 1 and called 911. The motorist reported seeing a male driver "screaming and hollering at this girl next to him." He further told the dispatcher that the driver "just whacked her in the mouth, she's all blood...." Following the 911 call, police pulled over the defendant and observed that Victim 1 had blood on her face, shirt, and pants.

Dated: July 20, 2018

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**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2018, I electronically filed Prosecution Version with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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